Remarks

Applicant respectfully requests that this Amendment After Final Action be admitted under 37 C.F.R. § 1.116.

Applicant submits that this Amendment presents claims in better form for consideration on appeal. Furthermore, applicant believes that consideration of this Amendment could lead to favorable action that would remove one or more issues for appeal.

Claims 1, 7, 13 and 20 have been amended. No claims have been canceled. Therefore, claims 1-24 are now presented for examination.

Claims 1, 7, 13, and 20 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. In addition, claims 1, 7, 13 and 20 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant submits that the above rejections have been obviated by the amendment of claims 1, 7, 13, and 20.

Applicant hereby submits replacement Figure 3.

Claims 1, 2, and 4-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over BOCCON-GIBOD (U.S. Pub. No. 2001/0016836) in view of Angelo (U.S. Patent No. 5,944,821). Applicant submits that the present claims are patentable over BOCCON-GIBOD in view of Angelo.

BOCCON-GIBOD discloses a system and method of distributing music and video signals over a network. The system includes a client. The client includes client helper software having a client manager module, playback module, codec units,

encryption/decryption modules, key store, key store lock and device manager. The playback module communicates with the codec units to decompress music and video content before playback. See BOCCON-GIBOD at paragraphs [0025] – [0026].

Angelo discloses a computer system that incorporates the capability to protect against the execution of unauthorized or modified code in real time. A secure hash table is provided that contains a secure hash value for each program that the user wants to track. The hash table is stored in protected memory that can only be accessed when the computer system is in a system management mode. Execution of a secured application is then predicated on its current hash value matching a corresponding hash value in the secure hash table. When a user attempts to execute a secured application, a system management interrupt (SMI) is generated. The SMI places the computer system in a system management mode, causing an SMI handler routine to be executed. The SMI handler first generates a current hash value for the program to be executed. Next, the SMI handler checks the stored hash table for an entry for the secured application. If a hash value entry is found, it is compared with the newly-calculated hash value for the secured application. In the event the two values match, the integrity of the application is guaranteed and it is loaded into memory and executed. For security-sensitive applications, the entire application or a portion of it is loaded into system management mode memory (hereinafter "SMM memory") prior to running the execution. If the two values do not match, the user is alerted to the discrepancy and may be given the option to update or override the stored hash table entry by entering an administrative password. See Angelo at col. 4, ll. 26 – col. 5, ll. 5.

Claim 1 of the present application recites:

A computer system comprising:

a compressor/decompressor (codec);

a system module having one or more functions called by the codec to render compressed content; and

an integrity agent to enforce conditions of use for the received content by examining a first voucher describing the integrity of the codec and a second voucher describing the integrity of the one or more functions that are to be accessed by the codec.

Applicant submits that BOCCON-GIBOD does not disclose or suggest an integrity agent that enforces conditions of use by examining a second voucher describing the integrity of one or more functions that are to be accessed by the codec. In fact, the Examiner admits that BOCCON-GIBOD does not disclose an integrity agent. See the Final Office Action at page 4, paragraph 4. Instead, the Examiner asserts that Angelo discloses such an integrity agent.

Angelo discloses using hash tables to protect against the execution of unauthorized or modified code. First, protecting against the execution of unauthorized or modified code is not equivalent to enforcing conditions of use for received content. Second, hash tables are not the same as a voucher that describes the integrity of functions to be accessed by a codec. Since neither BOCCON-GIBOD nor Angelo disclose or suggest that an integrity agent that enforces conditions of use for received content by examining a second voucher describing the integrity of the one or more functions that are to be accessed by the codec, any combination of BOCCON-GIBOD and Angelo would not disclose or suggest the feature. Therefore, claim 1 is patentable over BOCCON-GIBOD in view of Angelo.

Claims 2-6 depend from claim 1 and include additional features. Thus, claims 2-6

are also patentable over BOCCON-GIBOD in view of Angelo.

Claim 7 recites:

> A trusted player comprising:
> a compressor/decompressor (codec); and
> an integrity agent to enforce conditions of use
> for content received at the trusted player by
> examining a first voucher describing the integrity of
> the codec and a second voucher describing the
> integrity of the one or more functions that are to be
> accessed by the codec.

Thus, for the reasons described above with respect to claim 1, claim 7 is also

patentable over BOCCON-GIBOD in view of Angelo. Since claims 8-12 depend from

claim 7 and include additional features, claims 8-12 are also patentable over BOCCON-

GIBOD in view of Angelo.

Claim 13 recites:

> A method comprising:
> receiving content at a compressor/decompressor
> (codec);
> calling a function of a first component of a
> system module from the codec to assist in decoding
> the digital content;
> intercepting the function call to the first
> component of the system module at an integrity
> agent in order to enforce conditions of use of the
> content by examining a voucher describing the
> integrity of one or more functions that are to be
> accessed by the codec; and
> verifying the authenticity of the first component
> of the system module at the integrity agent by
> computing a digest of a memory image of the first
> component.

Thus, for the reasons described above with respect to claim 1, claim 13 is also

patentable over BOCCON-GIBOD in view of Angelo. In addition, Applicant submits

that BOCCON-GIBOD nor Angelo not disclose or suggest computing a digest of a

memory image of a first component. Accordingly, claim 13 is patentable over

BOCCON-GIBOD in view of Angelo. Because claims 14-19 depend from claim 13 and

include additional features, claims 14-19 are also patentable over BOCCON-GIBOD in

view of Angelo.

Claim 20 recites:

> An article of manufacture including one or more
> computer readable media that embody a program of
> instructions for verifying the authenticity of one or
> more functions utilized by a
> compressor/decompressor (codec) to assist in
> decoding the digital content, wherein the program
> of instructions, when executed by a processing unit,
> causes the processing unit to:
> call a function of a first component of a system
> module from the codec;
> intercept the function call to the first component
> of the system module in order to enforce conditions
> of use of the content by examining a voucher
> describing the integrity of one or more functions
> that are to be accessed by the codec; and
> verify the authenticity of the first component of
> the system module at the integrity agent by
> computing a digest of a memory image of the first
> component.

Thus, for the reasons described above with respect to claim 13, claim 20 is also

patentable over BOCCON-GIBOD in view of Angelo. Since claims 21-24 depend from

claim 20 and include additional features, claims 21-24 are also patentable over

BOCCON-GIBOD in view of Angelo.

Claim 3 stands rejected under 35 U.S.C. §103(a) as being unpatentable over

BOCCON-GIBOD in view of Angelo in view of Reid (U.S. Patent No. 5,844,575).

Applicant submits that the present claims are patentable over BOCCON-GIBOD in view of Angelo and Reid.

Reid discloses an apparatus and method for asynchronous compression of video information in a computer system. See Reid at Abstract. Nonetheless, Reid does not disclose or suggest that an integrity agent enforces conditions of use for received content by examining a second voucher. As discussed above, BOCCON-GIBOD and Angelo fail to disclose or suggest that an integrity agent enforces conditions of use for received content by examining a second voucher. Therefore, any combination of BOCCON-GIBOD, Angelo and Reid would also fail to disclose or suggest such a feature. As a result, the present claims are patentable over BOCCON-GIBOD in view of Angelo and Reid.
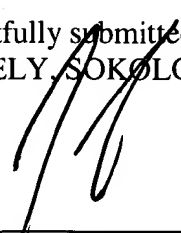
Applicant respectfully submits that the rejections have been overcome, and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: <u>May 15, 2006</u>

Mark L. Watson
Reg. No. 46,322

12400 Wilshire Boulevard
7th Floor
Los Angeles, California 90025-1026
(303) 740-1980

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